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9 Attorneys for Defendant:
10 THE NEIMAN MARCUS GROUP, INC.

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA

13 SHERRI RAHMANI,

14 Plaintiff,

15 v.

16 NEIMAN MARCUS GROUP, INC., a
17 Delaware Corporation,

18 Defendant.

Case No. C04-03313 VRW

**STIPULATION AND ORDER TO
CONTINUE ALL OUTSTANDING
DEADLINES PENDING RULING ON
DEFENDANT'S MOTION FOR SUMMARY
JUDGMENT/PARTIAL SUMMARY
JUDGMENT**

19 Defendant NEIMAN MARCUS GROUP, INC. and Plaintiff SHERRI RAHMANI hereby
20 request that the Court sign an Order implementing the following stipulation between the parties:

- 21 1. The Court has under submission Defendant's Motion for Summary Judgment/Partial
22 Summary Judgment.
- 23 2. The parties have already disclosed their respective experts.
- 24 3. The parties are required to complete expert discovery by the end of October 2005.
- 25 4. The Pretrial Conference is set for October 25, 2005. In connection with the Pretrial
26 Conference, the parties must prepare and file many documents, including a detailed
27 pretrial statement, trial memoranda, proposed jury instructions, exhibits, schedules,
28 summaries and charts to be used at trial, witness lists and summaries, objections to
evidence, voir dire forms and verdict forms.

5. The parties would like to avoid any unnecessary time and expense by having to prepare the required pretrial documents on claims that may be summarily adjudicated by the Court. The parties are of the joint belief that each side would be better served by an Order vacating the current Pretrial Conference date and setting a new one after the Court issues its ruling on the pending Motion for Summary Judgment/Partial Summary Judgment, should any claims remain.

WHEREFORE, the parties respectfully request that the Court Order that:

1. The Pretrial Conference set for October 25, 2005 is vacated. If needed, a new Pretrial Conference date will be set after the Court issues its ruling on the pending Motion for Summary Judgment/Partial Summary Judgment.
2. The deadline to complete expert discovery is vacated. If needed, a new deadline will be established after the Court issues its ruling on the pending Motion for Summary Judgment/Partial Summary Judgment.

IT IS SO STIPULATED.

Dated: 9-21-05



ERIC A. GROVER
SOFIJA VERZICH
LITTLER MENDELSON
A Professional Corporation
Attorneys for Defendant
THE NEIMAN MARCUS GROUP, INC.

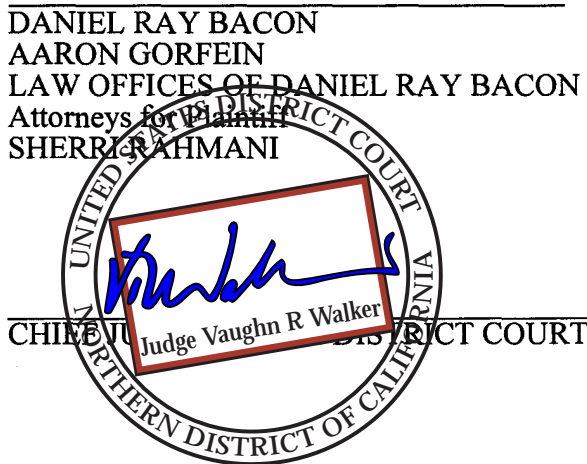
Dated: _____

DANIEL RAY BACON
AARON GORFEIN
LAW OFFICES OF DANIEL RAY BACON
Attorneys for Plaintiff
SHERRI RAHMANI

IT IS SO ORDERED.

Dated: _____

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CHIEF CLERK Judge Vaughn R. Walker

5. The parties would like to avoid any unnecessary time and expense by having to prepare the required pretrial documents on claims that may be summarily adjudicated by the Court. The parties are of the joint belief that each side would be better served by an Order vacating the current Pretrial Conference date and setting a new one after the Court issues its ruling on the pending Motion for Summary Judgment/Partial Summary Judgment, should any claims remain.

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IT IS SO STIPULATED.

Dated: _____

Dated: 9-20-05

ERIC A. GROVER
SOFIA VERZICH
LITTLER MENDELSON
A Professional Corporation
Attorneys for Defendant
THE NEIMAN MARCUS GROUP, INC.


DANIEL RAY BACON
AARON GORFEIN
LAW OFFICES OF DANIEL RAY BACON
Attorneys for Plaintiff
SHERRI RAHMANI

IT IS SO ORDERED.

Dated: _____

Firmwide: 80426633.1 042636.1022

CHIEF JUDGE OF THE DISTRICT COURT

LITTLER MENDELSON
A PROFESSIONAL CORPORATION
800 California Street
Twentieth Floor
San Francisco, CA 94103-2880

Stipulation and Order Vacating Pretrial
Conference

2.

Case No. C04-03313 VRW